Questions Regarding the Request for Comments
Related to Broadband Stimulus Programs
Issued by the Vermont Office of Economic Stimulus and Recovery
2009-03-13

Question: At the joint FCC/RUS/NTIA Public Meeting on March 10, it was indicated that there will likely be three rounds of Notice of Funds Availability. Does ESR anticipate more than one round of coordinated Vermont proposals?

Response: ESR would like to see Vermont compete for as many rounds of funding as possible. ESR would prefer that a strong, coordinated proposal be submitted as soon as it is feasible, preferably in the first round, with opportunities in subsequent rounds to make requests that were not funded in the first round.

Question: Should Vermont proposals self-limit to RUS or NTIA finding? Are you intending to allocate proposals between RUS and NTIA?

Response: RUS and NTIA are currently seeking comments on how they should structure their eligibility requirements and other programmatic elements to ensure that applicants that desire to seek funding from both agencies (i) do not receive duplicate resources and (ii) are not hampered in their ability to apply for funds from both agencies. At this point, ESR can see no reason why any proposal which might meet the funding criteria for either RUS or NTIA should not be prepared as if it would be submitted to either or both agencies, in order to maximize funding opportunities and options when final program parameters are known.

Question: Can ESR offer any presumptive guidance as to ways multiple broadband service providers might share distribution platforms in Vermont?

Response: We do not yet know how the NTIA will implement the network interconnection and nondiscrimination obligations or RUS will implement the preference for projects that will give end users a choice of more than one service provider. The agencies are currently taking comments on these issues. However ESR would encourage parties interested in stimulus funding to consider ways that funded infrastructure could be useful for multiple wireline or wireless broadband service providers, or combinations of the two.

Question: Can ESR offer a temporary, working definition of "under-served," while we await the FCC definitions?

Response: Any such guidance would necessarily be speculative. The NTIA is currently seeking comment on how it should define this term, including whether it should use one or more threshold transmission speeds in doing so.

Question: What is the process after we send you our program summary information, pursuant to the outline in that document? How do grant proposals move from ESR to NTIA and/or RUS?

Response: This is not fully known at this time. ESR has no specific expectation that it will serve as a conduit for proposals to NTIA or RUS, instead of applications being made directly to the funding agencies. We do expect that NTIA will consult with States, and NTIA is currently seeking comments on the appropriate role for States. ESR intends facilitate NTIA's consultation with the State of Vermont using whatever mechanisms NTIA will adopt.

At a minimum, ESR intends to review comments submitted to identify ways potential projects may be complementary or in conflict. Respondents may receive recommendations on steps which could improve proposed projects' coordination with other proposals and their likelihood of success.

Although it is unusual to begin such a process before programmatic rules are in place, NTIA announced at its public meeting on March 10, 2009, that it anticipated a first Notice of Funds Availability by as early as April, 2009, and RUS said at the same meeting it might issue a similar notice as early as May 2009. ESR does not anticipate that there is time to wait until final rules are in place in order to start.

Question: Assuming that ESR is successful, and NTIA and/or RUS award the grants submitted, how will the money flow to the projects?

Response: This will depend on the final program parameters, who is the applicant or who are the applicants, and who are partners with the applicant or applicants, none of which is known at this time.